

## Exhibit I

11/17/2003 MON 23:01 FAX

003/007

# Rules Committee

## Locals 799 800 & 805

To Stephen Keefe, s.s. # 033-42-9252 of local # 805

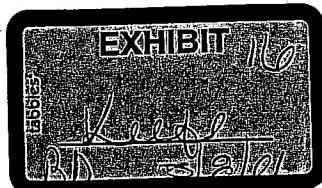
On February 6, 2003 the rules committee had met. After reviewing your pledge sheet that you had signed on May 5, 2000 and the deposition that took place on January 7, 2003

Stephen Keefe plaintiff V Local 805 I.L.A. defendants.

The committee has found you to be in violation of the hiring hall work rules, Rule # 37

As of this day February 6, 2003 you are hear by removed from gang 10 and lost all hiring hall privileges (jobs) for a period of six months. On August 6, 2003 you will be placed in gang 12 you may appear before the rules committee that day at 1:00 at the hiring hall where we conduct our monthly meetings to sign another pledge sheet.

The members of the I.L.A.  
Hiring hall rules committee  
Locals # 799, # 800 # 805



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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
C.A. NO.: 04-CV-11340DPW

\* \* \* \* \* STEPHEN KEEFE,

PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL

LONGSHOREMEN'S ASSOCIATION,

AFL-CIO, ET. AL,

DEFENDANTS.

\* \* \* \* \*

DEPOSITION OF STEPHEN KEEFE, taken on  
behalf of the Defendants, pursuant to the  
applicable provisions of the Federal Rules of  
Civil Procedure, before Bernadette J. D'Alelio,  
Notary Public and Court Reporter within and for  
the Commonwealth of Massachusetts, at the  
Offices of Mullen & McGourty, 52 Temple Place,  
Boston, Massachusetts, on May 8, 2006,  
at 10:01 a.m., as follows:

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1 A. You would have to talk to my brother.  
 2 I have nothing to do with that.  
 3 Q. Prior to your suspension, do you  
 4 contend that you weren't given written notice  
 5 about the specific charges that you were being  
 6 summoned to by the rules committee?  
 7 A. I never received anything from Joe  
 8 Picard at my post-office box.  
 9 Q. Even that letter you signed for, which  
 10 is marked --  
 11 A. This one, I received. This other  
 12 stuff -- I've never received anything from Joe  
 13 Picard. I received stuff from McGaff.  
 14 Q. About what?  
 15 A. I don't know what -- I don't know what  
 16 it was for.  
 17 Q. When you went to the rules committee  
 18 on March 5, to that meeting, why did you go?  
 19 A. I was told to go.  
 20 Q. By who?  
 21 A. By the rules committee.  
 22 Q. In what manner were you told, verbally  
 23 or in writing?  
 24 A. In writing.

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1 Q. So that would be Exhibit 18; is that  
 2 right?  
 3 A. Yes.  
 4 Q. What does Exhibit 18 say? Can you  
 5 read that into the record, please?  
 6 A. The whole thing?  
 7 Q. Yeah.  
 8 A. "The Allied rules committee, who are  
 9 empowered by Rule Number 37 of the hiring hall  
 10 rules, are hereby notifying you to appear  
 11 before them. The committee summons you on this  
 12 date of March 5, 2003, at 12 noon to appear at  
 13 the hiring hall. The purpose of this hearing  
 14 is for you to show just cause as to why you  
 15 should not be suspended and placed into Gang  
 16 12. Please bring with you any resignation, any  
 17 retirement papers, tax returns or any other  
 18 documents that you deem pertinent. We have  
 19 found you to be in violation of not honoring  
 20 the pledge that you signed. Failure to appear  
 21 at this hearing could also result in a  
 22 sanction."  
 23 Q. And you got that letter?  
 24 A. I think I got that one, yeah.

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1 Q. That is what the certified-mail card  
 2 is?  
 3 A. It coincides with that, yes.  
 4 Q. In reading Exhibit 18, do you  
 5 understand what is being stated in that letter?  
 6 A. Yeah.  
 7 Q. Did you understand it when you read  
 8 it?  
 9 A. Yes.  
 10 Q. And you got that on February 18th; is  
 11 that right?  
 12 A. Yup.  
 13 Q. That is about two weeks prior to the  
 14 meeting?  
 15 A. Yes.  
 16 Q. Do you contend that two weeks' notice  
 17 is an unreasonable amount of time for you to be  
 18 summoned to a meeting?  
 19 A. No.  
 20 Q. When you got into the hearing or the  
 21 meeting, you waited outside and then you were  
 22 summoned in; is that right?  
 23 A. Yes.  
 24 Q. Given what you've read from Exhibit

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1 18, do you recall any discussion as to what the  
 2 point of view -- being called to the meeting?  
 3 A. I don't remember anything about what  
 4 they were saying at the meeting.  
 5 Q. Did you go with an attorney to the --  
 6 A. No.  
 7 Q. At the time, Mr. Lathrop was  
 8 representing you, though, wasn't he?  
 9 A. Yeah, I think so, right. Yeah.  
 10 Q. Did you inform the rules committee on  
 11 March 5, 2005, that you were working for John  
 12 T. Clark as a consultant?  
 13 A. I don't know if I said that.  
 14 Q. Did you inform the rules committee, or  
 15 did you state to the rules committee that they  
 16 knew of your employment at John T. Clark, yet  
 17 allowed you to move up from 12 to 11?  
 18 A. I don't remember.  
 19 Q. If you admitted that you were employed  
 20 by Clark at that rules committee meeting, do  
 21 you have any memory of saying you were going to  
 22 resign your position because you wanted to stay  
 23 in Gang 10?  
 24 A. I don't remember.